



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: June 28, 2013

SUBJECT: Comments on the Draft RI Report Scoping Summary, East Troy
Contaminated Aquifer Site

FROM: Edward Karecki, U.S. Fish and Wildlife Service Biologist

TO: Shari Kolak, Remedial Project Manager

Surface Water and Sediment

1) First bullet: It is not clear what is meant by the statement "No significant impacts to surface water and sediment in the Great Miami River have been observed". The ecological risk assessment has not yet been completed and justification should be provided or this bullet should be removed.

2) Second bullet: This bullet indicates that detections of contaminants in surface water and sediment do not appear to be related to potential on-site VOC source areas. This still leaves an open question – are the contaminants site related even though they may not be part of the VOC source areas? Sample SB-HOB7-O-0512, the only surface soil grab sample shown in Table 7 of the Phase I, shows detections of pesticides, PCBs, PAHs and metals.

3) Third bullet: It is not clear what is meant by "low" concentrations. It is important to discuss the concentrations in relation to ecological benchmarks and potential ecological risk. The reference to common laboratory contaminants is misleading because all of the

listed detections do not fit that designation. The more important question is whether they are site related.

4) Fourth bullet: This statement, that indicates that no additional sampling is expected, seems premature. Page 17 (Section 5.0, D.) of the Phase I Investigation Summary and Proposed Phase II Investigation Activities Technical Memorandum gives an example of where additional sampling may be needed.

Ecological Risk Assessment

5) First bullet: It is not clear why the assumption that a baseline ecological risk assessment (BERA) is not needed is being made before completion of the SLERA. The results of the SLERA will help us determine whether a BERA is needed.

6) Third bullet: Maximum levels detected in wells should also be evaluated. This provides a potential worst case scenario and may predict future risk.

7): The ecological risk assessment should be prepared in accordance with Ecological Risk Assessment Guidance for Superfund (EPA 540-R-97-006) and ECO Update/Ground Water Forum Issue Paper: Evaluating Ground-Water/Surface-Water Transition Zones in Ecological Risk Assessment (EPA-540-R-06-072).

8) Fourth bullet: It is not clear what is meant by this bullet and it should be removed. Although some parts of the west bank are concrete lined, the east bank is not. The river is channelized near the site but returns to a more natural meander immediately downstream. The area below the low head dam is within the potential plume discharge zone and is attractive to fish and other aquatic life.

9) Sixth bullet: The grassy areas along the river and within the area of concern would be attractive to certain migratory birds, such as the American Robin. Sample SB-HOB7-0-0512, the only surface soil grab sample shown in Table 7 of the Phase I, shows

detections of pesticides, PCBs, PAHs and metals. The Dieldrin detection, for example, exceeds several ecological soil screening benchmarks.

08/09/13

OEPA Comments on Phase II Investigation Summary Technical Memo/Proposed Phase III Remedial Investigation Activities

Phase II Investigation Summary Technical Memo July 26, 2013:

No further comment.

Proposed Phase III Remedial Investigation Activities:

1. To aid in identifying proposed sampling and to be used during field work, it would be beneficial to include in the Phase III Work Plan close up figures of each source area that depict previous data and indicate data gaps and proposed sampling types and locations. Please include indoor locations at the Hobart and Spinnaker properties where soil borings and sampling will occur.
2. Please indicate on the CSM that the supplied CSM in the Phase III proposal document is specific to identifying data gaps for the Phase III work and is not a comprehensive CSM for the ETCA site. Or update the CSM to reflect the entire site.
3. Even though surface soils on the Spinnaker and Hobart properties are covered by asphalt, there is still a potential future exposure pathway if the asphalt were to be removed; the CSM needs to be updated to reflect the potential direct contact exposures to I/C Workers and Construction Workers for surface soils.
4. Please clarify whether the pathway for soil contamination by irrigation with contaminated ground water is complete/potentially complete.
5. During the group discussion on the Phase III Proposals, it was determined that surface soil samples still represent a data gap. Discuss in the Phase III Proposal where surface soil samples will be taken.